

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

v.

D-1 DANIEL MARTINEZ DUENAS,  
D-2 JUAN WILLIE LOPEZ,  
D-3 ERFAN KHAVARMANESH, and  
D-4 DIEGO ALEJANDRO SALAZAR-DIAZ.

Defendants.

Violations:

21 U.S.C. § 1956(h)  
21 U.S.C. § 1956(a)(1)(B)(i)

Case: 2:24-cr-20683  
Assigned To : Goldsmith, Mark A.  
Referral Judge: Patti, Anthony P.  
Assign. Date : 12/11/2024  
Description: INDI USA v SEALED MATTER (JP)

Indictment

The Grand Jury charges that:

Count One  
**Conspiracy to Launder Monetary Instruments**  
**18 U.S.C. § 1956(h)**

D-1 DANIEL MARTINEZ DUENAS  
D-2 JUAN WILLIE LOPEZ  
D-3 ERFAN KHAVARMANESH  
D-4 DIEGO ALEJANDRO SALAZAR-DIAZ

From in or around May 2022 through on or about September 29, 2022, in the Eastern District of Michigan, and elsewhere, the defendants, DANIEL MARTINEZ DUENAS, JUAN WILLIE LOPEZ, ERFAN KHAVARMANESH, and DIEGO ALEJANDRO SALAZAR-DIAZ, knowingly combined, conspired, and agreed with each other and with other persons known and unknown to the

Grand Jury, to commit offenses in violation of Title 18, United States Code, Section 1956, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of a specified unlawful activity, that is, possession of a controlled substance with intent to distribute and distribution of a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and conspiracy to commit those offenses, in violation of Title 21, United States Code, Section 846, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and knowing while conducting and attempting to conduct such financial transactions that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); all in violation of Title 18, United States Code, Section 1956(h).

**Count Two**  
**Laundering of Monetary Instruments**  
**18 U.S.C. § 1956(a)(1)(B)(i)**

- D-1 DANIEL MARTINEZ DUENAS  
D-2 JUAN WILLIE LOPEZ  
D-3 ERFAN KHAVARMANESH

From on or about September 11, 2022, to on or about September 19, 2022,

in the Eastern District of Michigan, and elsewhere, the defendants, DANIEL MARTINEZ DUENAS, JUAN WILLIE LOPEZ, and ERFAN KHAVARMANESH, knowingly conducted and attempted to conduct a financial transaction affecting interstate and foreign commerce, to wit, the delivery of approximately \$189,650 in bulk cash, which was subsequently converted to cryptocurrency (USDC) and transferred by wire, minus commissions, to a cryptocurrency wallet, which transaction involved the proceeds of a specified unlawful activity, that is, possession of a controlled substance with intent to distribute and distribution of a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and conspiracy to commit those offenses, in violation of Title 21, United States Code, Section 846, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

### **Forfeiture Allegations**

The allegations contained in Counts One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture

under Title 18, United States Code, Section 982(a)(1).

Pursuant to Title 21, United States Code, Section 982(a)(1), the defendants convicted of the money laundering offenses charged in Counts One and Two of the Indictment shall forfeit to the United States of America any property, real or personal, involved in such offenses, and any property traceable to such property.

As part of the forfeiture in this case and upon conviction of the defendants, the United States intends to seek entry of a forfeiture money judgment against the defendants representing the value of the property involved in the violations of Counts One and Two of the Indictment.

If any of the property described above, as a result of any act or omission of the defendant[s]:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

**This is a True Bill.**

/s/ Grand Jury Foreperson  
Grand Jury Foreperson

DAWN N. ISON  
United States Attorney

/s/ Benjamin Coats  
Benjamin Coats  
Chief, Drug Task Force Unit

/s/ Rajesh Prasad  
Rajesh Prasad  
Assistant United States Attorney

/s/ Timothy P. McDonald  
Timothy P. McDonald  
Assistant United States Attorney

Dated: December 11, 2024

|  |                           |             |
|--|---------------------------|-------------|
| United States District Court<br>Eastern District of Michigan | Criminal Case Cover Sheet | Case Number |
|--|---------------------------|-------------|

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

|  |  |                        |
|--|--|------------------------|
| <b>Companion Case Information</b>  |  | Companion Case Number: |
| This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> : |  | Judge Assigned:        |
| <input type="checkbox"/> Yes   | <input checked="" type="checkbox"/> No | AUSA's Initials: RCP   |

Case Title: USA v. Daniel Martinez Duenas, et. al.

County where offense occurred : Wayne

Check One:  Felony       Misdemeanor       Petty

- Indictment/ Information --- no prior complaint.  
 Indictment/ Information --- based upon prior complaint [Case number: ]  
 Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

### Superseding Case Information

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- Corrects errors; no additional charges or defendants.  
 Involves, for plea purposes, different charges or adds counts.  
 Embraces same subject matter but adds the additional defendants or charges below:

| <u>Defendant name</u> | <u>Charges</u> | <u>Prior Complaint (if applicable)</u> |
|-----------------------|----------------|--|
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

December 11, 2024

Date

  
Rajesh Prasad, Assistant U.S. Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.